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July 1, 2010

MEMORANDUM

TO: Council Members

FROM: Peter Paquet, Manager Wildlife & Resident Fish

SUBJECT: Update on Wildlife Crediting Forum

BACKGROUND:

In the 2009 Fish and Wildlife Program, the Council called for the initiation of a Wildlife Mitigation Crediting Forum to: "1) recommend a commonly accepted ledger of habitat units acquired; 2) recommend to the Council ways to resolve issues about accounting for habitat units; and 3) develop a common data base for tracking, assigning and recording habitat units." In addition, "[a]s part of the crediting forum, the Council will work with Bonneville and the managers to develop a comprehensive agreement on the proper crediting method for construction and inundation losses or strategies that will allow parties to reach long-term settlement agreements. Once completed, the Council will consider adopting the comprehensive agreement into the Program."

The Wildlife Crediting Forum (WCF) has met four times since its initial meeting in January. Initial meetings identified key objectives, issues, priorities and schedules for future meetings and provided forum participants with background on the history of the wildlife provisions in the Council's Fish and Wildlife Program, the development of the Habitat Evaluation Procedure (HEP), the role of HEP in the Council's Fish and Wildlife Program. Subsequent to these presentations, participants developed a list of issues they felt the forum should address.

The WCF formed two subgroups to address the key issues affecting the accuracy and acceptability of the wildlife crediting ledger. One subgroup (Ledger Subcommittee) focused on identifying and evaluating the primary factors contributing to inconsistencies in the current ledger. Issues that this group addressed included such things as how to account for minimum habitat units, stacking issues, crediting overlaps, inaccurate initial habitat unit evaluations and several other accounting issues. The second subgroup (Fish Habitat Subcommittee) was charged with developing recommendations for assessing how much wildlife credit Bonneville should

receive for fish habitat projects that provide benefit to wildlife species. Both subgroups met and provided their recommendations to the full WCF.

At the May meeting of the WCF, the Ledger Subcommittee provided a report that identified a number of technical and policy issues that would need to be addressed in order to develop a comprehensive and consistent crediting ledger based on habitat unit accounting. Included were issues such as lack of consistency in the use of the Habitat Evaluation Procedure (HEP), HEP models, data collection, “stacking” and other related issues. Following a lengthy discussion of the issues, the WCF agreed that resolution of many of these issues would require reevaluation and assessment of many of the original HEPs and a number of the subsequent project HEPs. The forum concluded that these efforts would likely be both labor intensive and time consuming, and that it was likely that following such an effort there would be unresolved issues. Forum members agreed that a better course of action would be to focus the efforts of the WCF on long-term agreements. To that end the group instructed the facilitators and staff to develop both a map depicting the location of all wildlife projects and a spreadsheet/template reflecting the most current information on wildlife mitigation projects to be used as the basis for settlement discussions. Drafts of these were completed and discussed at the June WCF meeting and are currently being revised following review and comment from the forum membership. These will be posted on the Council’s website and will be presented at the July Council meeting.

The Fish Habitat Subcommittee developed a list of current Bonneville funded fish habitat projects having potential benefits for wildlife and reviewed those based on the criteria for wildlife projects contained in the Council’s 2009 Fish and Wildlife Program. Following this procedure, the subcommittee provided recommendations on which projects should potentially be credited against wildlife construction and inundation losses. Those projects that did not meet all Program criteria were designated as “negotiable” in terms of how much, if any, wildlife credit should be assigned to them (Attachment 1).

Additionally, the WCF members are in the process of developing a “roadmap” to facilitate discussions leading to agreements. This will be the major topic of discussion at the upcoming July meeting.

Council Guidance Needed

At this juncture, it appears as if the WCF members are in agreement that the preferred course of action is to move towards developing a framework for negotiated settlement agreements. It is important to note that to date these discussions have occurred among the technical representatives to the forum. The members would need the concurrence of their respective policy representatives before a final decision could be made by the WCF. If Council members have concerns regarding the direction in which the forum is moving, we would appreciate their input at this time. Absent such concerns by the Council the WCF will continue to proceed as described above.

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	PROJECT NAME	PROJECT NO.	SPONSOR	STATE	PROJ. SUBBASIN	ACREAGE	HUS	PERMANANCE	SPECIES	MGMT PLAN	O&M	MITIGATED DAM	LEDGER
3	CATEGORY A--FISH HABITAT PROJECTS WITH WILDLIFE PROJECT ASSOCIATIONS												
4	YAKAMA NATION RIPARIAN/WETLANDS RESTORATION	1992-062-00	YAKAMA NATION	WA	YAKIMA	5,000	<i>Note 1</i>	YES	Waterfowl, eagle, raptor	YES	BPA	Lower 4	C&I
5	PINE CREEK (WAGNER CONSERVATION AREA)	1998-022-00	CTWSRO	OR	JOHN DAY	9,000	<i>Note 1</i>	YES	Bighorn Sheep	YES	BPA	Lower 4	C&I
6	RAINWATER WILDLIFE AREA (Part II)	2000-026-00	CTUIR	WA	WALLA WALLA	2,340	<i>Note 1</i>	YES	Elk, cougar, hawk, eagle	YES	BPA	Lower 4	C&I
7	FORREST CONSERVATION AREA	2001-041-01	CTWSRO	OR	JOHN DAY	4,232	<i>Note 1</i>	YES	Yellow warbler, mule deer, e	YES	BPA	Lower 4	C&I
8	OXBOW CONSERVATION AREA	2000-015-00	CTWSRO	OR	JOHN DAY	1,022	<i>Note 1</i>	YES	Columbia spotted frog, white	YES	BPA	Lower 4	C&I
9					SUB-TOTAL	21,594							
10													
11	CATEGORY B--FISH PROJECTS WITH WILDLIFE VALUE												
12	BUSTERBACK RANCH/ALTURAS LAKE CREEK (F&W)	Acq'd 4/1/1992	USDA FOREST SERVICE	ID	SALMON	2,201		YES	Mountain goat, northern flyin	Forest Plan	USDAFS	<i>Note 2</i>	Negotiable
13	ELK CREEK CATTLE & HORSE ALLOTMENT	20032	SBT & IDFG (USDA FOREST SERVICE)	ID	SALMON	121,000		YES	Lynx	Forest Plan	USDAFS	Negotiable	Negotiable
14	JOHNSON CREEK PROJECT		USDA FOREST SERVICE	ID									
15	BURGDORF MEADOWS	1998-023-00	IDFG & NEZ PERCE TRIBE	ID	SALMON	94		YES	Moose	CE	No (CE)	Negotiable	Negotiable
16	ZUMWALT PRAIRIE PRESERVE (CAMP CREEK RANCH)	2001-043-00	NATURE CONSERVANCY	OR	IMNAHA	27,000		YES	Hawks	Plan & CE	TNC	Snake/negotiable	Negotiable
17	YAKIMA SIDE CHANNELS (UPPER YAKIMA)	1995-051-00	YAKAMA NATION	WA	YAKIMA	544		YES	Mallard, yellow warbler	Yes	BPA	Lower 4	C&I
18	YAKIMA SIDE CHANNELS (LOWER NACHES)	1995-051-00	YAKAMA NATION	WA	YAKIMA	376		YES	Mallard, yellow warbler	Yes	BPA	Lower 4	C&I
19	UPPER YAKIMA (CLE ELUM) HATCHERY	1988-115-00	YAKAMA NATION	WA	YAKIMA	353		YES	Mallard, yellow warbler	In Devel.	BPA	Lower 4	C&I
20	COLVILLE FISH HABITAT PROJECTS	2008-104-00	COLVILLE TRIBES	WA	OKONOGAN	176	<i>Note 1</i>	YES	Bobcat, mink, mule deer	In Development	Pending Review	Coulee/Chief Joseph	Negotiable
21	SANDY RIVER DELTA	1999-025-00	USDA FOREST SERVICE	OR	SANDY	1,400		YES	Bald eagle, yellow warbler	Yes	USDAFS (and BPA)	Lower Columbia	Negotiable
22	OAK FLATS (NACHES RIVER)	2007-194-00	WDFW	WA	YAKIMA	289		YES	Bald eagle, bighorn sheep, b	In Development	WDFW	Upper/Lower Columbia	Negotiable
23	RED RIVER WILDLIFE AREA (LITTLE PONDEROSA)	1993-035-01	IDFG	ID	CLEARWATER	1,300	<i>Note 1</i>	YES	Elk, migratory birds	Yes		Negotiable	Negotiable
24	HANCOCK SPRINGS	2002-013-01	NFWF, METHOW CONSERVANCY	WA	METHOW	122	<i>Note 3</i>	YES	Bald eagle, mule deer	CE	Fee holder		
25	MID-METHOW / LEHMAN	2002-013-01	NFWF, METHOW CONSERVANCY	WA	METHOW	93	<i>Note 3</i>	YES	Bald eagle, mule deer, blue	CE	Fee holder		
26	HEATH	2002-013-01	NFWF, METHOW CONSERVANCY	WA	METHOW	140	<i>Note 3</i>	YES	Bald eagle, blue/white-tailed	CE	Fee holder		
27	COTTONWOOD FARMS / WITTE PLACE	2002-013-01	NFWF, METHOW CONSERVANCY	WA	METHOW	54	<i>Note 3</i>	YES	Bald eagle, mule deer	CE	Fee holder		
28					SUB-TOTAL	155,142							
29	WILLOW GROVE	2003-011-00	COLUMBIA LAND TR	WA	COLUMBIA ESTUARY	312	<i>Note 1</i>	YES	Waterfowl	Yes - In Dev	Fee holder	Lower Columbia	Negotiable
30	ELOCHOMAN RIVER	2003-011-00	COLUMBIA LAND TR	WA	COLUMBIA ESTUARY	183	<i>Note 1</i>		Deer, eagle, blue heron	Yes - In Dev	Fee holder	Lower Columbia	Negotiable
31	CROOKED CREEK (F&W)	2003-011-00	COLUMBIA LAND TR	WA	COLUMBIA ESTUARY	60	<i>Note 1</i>	YES	Deer, eagle, blue heron		Fee holder	Lower Columbia	Negotiable
32	CRAZY JOHNSON CREEK	2003-011-00	COLUMBIA LAND TR	WA	GRAYS	305	<i>Note 1</i>	YES	Deer, eagle, blue heron	Forest Plan	Fee holder	Lower Columbia	Negotiable
33	WALKER ISLAND	2003-011-00	COLUMBIA LAND TR	OR	COLUMBIA ESTUARY	100	<i>Note 1</i>	50-yr Lease	White-tailed deer	Yes - In Dev	Fee holder	Willamette	Negotiable
34	CRIMS ISLAND	2003-011-00	COLUMBIA LAND TR	OR	COLUMBIA ESTUARY	451	<i>Note 1</i>	YES	White-tailed deer	Draft	USFWS	Willamette	Negotiable
35	GERMANY CREEK	2003-011-00	COLUMBIA LAND TR	WA	COLUMBIA ESTUARY	155	<i>Note 1</i>	YES	Deer, eagle, blue heron	Yes - In Dev	Fee holder	Lower Columbia	Negotiable
36	WOLF BAY WILDLIFE PROJECT	2003-011-00	COLUMBIA LAND TR	OR	WILLAMETTE	77	<i>Note 1</i>	YES	Deer, eagle, blue heron	Yes - In Dev	Fee holder	Willamette	Negotiable
37					SUB-TOTAL	1643							
38					TOTAL	178,379							
39													
40		Note 1	BPA credit acknowledged in principle by resource manager or project proponent.										
41		Note 2	Given setting and species present, parties need to negotiate what dam and what ledger to credit against.										
42		Note 3	BPA and Council staffs are looking into whether there is a commitment to not credit water transaction projects for wildlife value.										
43													

Cell: F4

Comment: Gary Becker:
Acreage updated per information provided by YN.

Cell: H4

Comment: Gary Becker:
Various parcels protected via fee title, easements, or long-term lease

Cell: I4

Comment: Gary Becker:
2006 and 2008 annual reports, 2009 proposal and respnse. Wetland and riparian species.

Cell: J4

Comment: Gary Becker:
Available on Pisces

Cell: K4

Comment: Gary Becker:
BPA Funding Commitment per MOA

Cell: B5

Comment: Gary Becker:
Wagner CA acquired by project 2001-04-000

Cell: F5

Comment: Gary Becker:
9253 acres comprise Wagner acquisition

Cell: H5

Comment: Gary Becker:
Pine Creek CA and Wagner CA acquired in fee

Cell: I5

Comment: Gary Becker:
Targets per Wagner proposal:
Bighorn sheep (John Day Sub. focal species)
Mule Deer (John Day Sub. managed game and HEP species)
Rocky Mountain Elk (John Day Sub. critical functional link and manged game)

Cell: J5

Comment: Gary Becker:
Pine Creek CA Wildlife Habitat and Watershed Management Plan, by CTWSRO, BPA-approved 9/15/2004

Cell: K5

Comment: Gary Becker:
BPA funding commitment per BPA/Tribe MOA

Cell: L5

Comment: Gary Becker:
Proposal: "to compensate for inundation by JD dam"

Cell: I6

Comment: Gary Becker:
2008 Annual Report:
9 SB Focal species
"The Walla Walla Subbasin is inhabited by 10 amphibian species,
207 avian species, 69 mammalian species, and 15 reptile species. The wildlife area is
probably best known for its quality big game hunting. Located entirely within the WDFW
Dayton Big Game Management Unit (#162), the area supports large populations of elk and
deer. Other game animals include black bear, cougar, blue and ruffed grouse, wild turkey,
and California quail. The area also provides habitat for a wide variety of forest dwelling
birds such as woodpeckers, owls, insectivorous birds, accipiters and other hawks, and eagles."

Cell: J6

Comment: Gary Becker:
On Pisces

Cell: F7

Comment: Gary Becker:
4232 acres acquired

Cell: H7

Comment: Gary Becker:
Acquired in fee, 2002

Cell: I7

Comment: Gary Becker:
Focal Species:
Black-capped chickadee (John Day Sub. HEP)
Mallard (John Day Sub. Managed game and HEP)
Mink (John Day Sub. managed game, critical functional link, and HEP)
Western meadowlark (John Day Sub. HEP)
Yellow warbler (John Day Sub. HEP, focal)
Mule deer (John Day Sub. managed game and HEP)
California Quail (John Day Sub. Managed game and HEP)

Cell: J7

Comment: Gary Becker:

Oxbow and Forrest Conservation Areas Property and Habitat Management Plan, dated 3/1/2010

Cell: K7

Comment: Gary Becker:
BPA funding commitment per BPA/Tribe MOA

Cell: L7

Comment: Gary Becker:
To compensate for inundation by JD dam

Cell: F8

Comment: Gary Becker:
1022 acres acquired

Cell: H8

Comment: Gary Becker:
Purchased in fee, 2001

Cell: I8

Comment: Gary Becker:
Focal Species:
Columbia spotted frog (federal candidate species, John Day Sub. focal)
White-tailed deer (John Day Sub. managed game)
Black-capped chickadee (John Day Sub. HEP)
Mallard (John Day Sub. Managed game and HEP)
Mink (John Day Sub. managed game, critical functional link, and HEP)
Western meadowlark (John Day Sub. HEP)
Yellow warbler (John Day Sub. HEP, focal)

Cell: J8

Comment: Gary Becker:
Oxbow and Forrest Conservation Areas Property and Habitat Management Plan, dated 3/1/2010

Cell: K8

Comment: Gary Becker:
BPA funding commitment per BPA/Tribe MOA

Cell: L8

Comment: Gary Becker:
To compensate for inundation by JD dam

Cell: H12

Comment: Gary Becker:
Acquired in fee, transferred to FS with CE

Cell: J12

Comment: Gary Becker:
Sawtooth National Forest Management Plan, 2003

Cell: A13

Comment: Gary Becker:
Elk Creek Grazing Allotment, acquired 2000. Bear Valley Allotment (abutting) acquired in 2001.

Cell: B13

Comment: Gary Becker:
Elk Creek Allotment: FY2000 Proposal 20032, "Protect Bear Valley Wild Salmon, Steelhead, Bull Trout Spawning Habitat."
Bear Valley & Deer Creek Allotments: 2000-005-00 (not completed) and 2001-035-00, "Protect Bear Valley Wild Salmon, Steelhead, Bull Trout Spawning and Rearing Habitat"

Cell: F13

Comment: Gary Becker:
Elk Creek closed 48,000 acre grazing allotment; Bear Valley and Deer Creek allotments are abutting, closed 73,000 acres (121,000 total)

Cell: H13

Comment: Gary Becker:
USDAFS permanently closed grazing following purchase of existing rights; land part of national forest system

Cell: I13

Comment: Gary Becker:
Supports populations of "lynx, wolf, furbearers, and nongame riparian dependent species"
Lynx: ESA threatened, Salmon Sub. Focal
Gray wolf: ESA endangered

Cell: J13

Comment: Gary Becker:
2003 Boise National Forest Plan amended to eliminate grazing areas; land designated as "Passive Restoration" and managed in accordance with Forest Plan going forward
<http://www.fs.fed.us/r4/sawtooth/arevision/boiseplan.htm>

Cell: A14

Comment: Gary Becker:
To date, I have only located the salmon hatchery/monitoring project: 1996-043-00, "Johnson Creek Artificial Propagation Enhancement Project." Still awaiting more information on a project with wildlife value.

Cell: A15

Comment: Gary Becker:
Subcommittee suggested to remove project from list.

Cell: B15

Comment: Gary Becker:
Not in Pisces/CBFWA; found reference in other documents (project 2002-058-00; NPCC budget table)

Cell: H15

Comment: Gary Becker:
Perpetual conservation easement to protect the property in its current state and prevent development. Grantor may graze 6 head of stock in movable fenced enclosures, maintain an emergency primitive airstrip, and use the property for recreation. The easement prohibits the usual activities.

Cell: H16

Comment: Gary Becker:
Owned by TNC, perpetual CE held by BPA

Cell: I16

Comment: Gary Becker:
Per proposal:
Columbian sharp-tailed grouse (extirpated and reestablished);
Ferruginous Hawks (ODFW Critical species);
Swainson's Hawks (ODFW vulnerable species);
Elk (managed game, Imnaha focal);
Mule deer (Imnaha focal)

Cell: J16

Comment: Gary Becker:
There is a management plan, and a subplan specifically for experimental grazing. Generally, the easement prohibits any activity inconsistent with the purpose, which is to protect the eocological condition and natural function of the site's aquatic and terrestrial habitats and the species it supports.

Cell: M16

Comment: Gary Becker:
BPA receives 2/11 share of credit

Cell: F17

Comment: Gary Becker:
544 includes all acquisitions in the "Easton/Cle Elum Reach (Kittitas County)" except the Upper County Community Chourch (6 acres).

Cell: H17

Comment: Gary Becker:
Not clear if property is protected by fee simple acquisition or CE.

Cell: I17

Comment: Gary Becker:
Narrative: "Over 80% of the bioregion's terrestrial wildlife will also benefit from this habitat protection effort."
FY1999 proposal: "Further, the project will protect and restore terrestrial wildlife species through riparian habitat fencing, and purchase of conservation easements and property."

Cell: J17

Comment: Gary Becker:
FY2007 proposal narrative: "The YSC project is managed under the auspices of the Yakima-Klickitat Fisheries Program (YFFP), which is the largest and most complex fisheries management project in the Yakima Subbasin in terms of data collection and management, physical facilities, habitat protection, restoration and management, and experimental design and research on the basin's fisheries resources (Yakima Subbasin Plan Supplement, p 36)"

Cell: K17

Comment: Gary Becker:
O&M by BPA through project 1988-120-25

Cell: F18

Comment: Gary Becker:
376 includes all acquisitions in "Lowr Naches Reach" and "Union Gap Reach" in 2007 proposal narrative. 61 of the acres in Lower Naches were not funded by BPA, though.

Cell: H18

Comment: Gary Becker:
Not clear if property is protected by fee simple acquisition or CE.

Cell: I18

Comment: Gary Becker:
Narrative: "Over 80% of the bioregion's terrestrial wildlife will also benefit from this habitat protection effort."
FY1999 proposal: "Further, the project will protect and restore terrestrial wildlife species through riparian habitat fencing, and purchase of conservation easements and property."

Cell: J18

Comment: Gary Becker:
FY2007 proposal narrative: "The YSC project is managed under the auspices of the Yakima-Klickitat Fisheries Program (YFFP), which is the largest and most complex fisheries management project in the Yakima Subbasin in terms of data collection and management, physical facilities, habitat protection, restoration and management, and experimental design and research on the basin's fisheries resources (Yakima Subbasin Plan Supplement, p 36)"

Cell: K18

Comment: Gary Becker:
O&M by BPA through project 1988-120-25

Cell: A19

Comment: Gary Becker:
Can't find any information on wildlife aspects; development appears to be on only 15 out of 500 acres owned by BPA

Cell: K19

Comment: Gary Becker:
Hatchery O&M via project 1997-013-25

Cell: G20

Comment: Gary Becker:
"The Tribe agrees that BPA may credit the habitat units identified at a one-to-one basis against wildlife losses associated with Grand Coulee or Chief Joseph Dams." 2008 Fish Habitat MOA.

Cell: H20

Comment: Gary Becker:
Tribe title, BPA CE

Cell: K20

Comment: Gary Becker:

Tribe obligated to maintain, BPA funding optional

Cell: H21

Comment: Gary Becker:
FS owns in fee

Cell: J21

Comment: Gary Becker:
USFS prepared a management plan, on file with BPA. It directs trail construction and recreational use away from the most sensitive areas.

Cell: F22

Comment: Gary Becker:
Total property is 357 acres, proposal says acquire 300

Cell: J23

Comment: Gary Becker:
IDFG Red River Wildlife Management Area Plan

Cell: K23

Comment: Gary Becker:
Proposal not funded by BPA for FY07-FY09

Cell: H24

Comment: Gary Becker:
Perpetual CE

Cell: J24

Comment: Gary Becker:
Perpetual CE with Methow Conservancy, requires the riparian areas to remain in natural state and protects remaining habitat types by prohibiting development beyond small residential envelopes and restricting forest and agricultural practices.
Provision for effort to develop stewardship plan.

Cell: J25

Comment: Gary Becker:
Perpetual CE with Methow Conservancy, requires the riparian areas to remain in natural state and protects remaining habitat types by prohibiting development beyond small residential envelopes and restricting forest and agricultural practices.
Provision for effort to develop stewardship plan.

Cell: J26

Comment: Gary Becker:
Perpetual CE with Methow Conservancy, requires the riparian areas to remain in natural state and protects remaining habitat types by prohibiting development beyond small residential envelopes and restricting forest and agricultural practices.
Provision for effort to develop stewardship plan.

Cell: J27

Comment: Gary Becker:
Perpetual CE with Methow Conservancy, requires the riparian areas to remain in natural state and protects remaining habitat types by prohibiting development beyond small residential envelopes and restricting forest and agricultural practices.
Provision for effort to develop stewardship plan.

Cell: H29

Comment: Gary Becker:
BPA holds CE prohibiting the usual: residential or commercial use, soil or trash deposition; excavation or dredging; topogirphical alterations; grazing, logging, or other uses that BPA determines has a material negative impact on fish or fish and wildlife habitat.

Cell: H30

Comment: Gary Becker:
BPA holds CE prohibiting the usual: residential or commercial use, soil or trash deposition; excavation or dredging; topogirphical alterations; grazing, logging, or other uses that BPA determines has a material negative impact on fish or fish and wildlife habitat.

Cell: H31

Comment: Gary Becker:
BPA holds CE prohibiting the usual: residential or commercial use, soil or trash deposition; excavation or dredging; topogirphical alterations; grazing, logging, or other uses that BPA determines has a material negative impact on fish or fish and wildlife habitat.

Cell: H32

Comment: Gary Becker:
BPA holds CE prohibiting the usual: residential or commercial use, soil or trash deposition; excavation or dredging; topogirphical alterations; grazing, logging, or other uses that BPA determines has a material negative impact on fish or fish and wildlife habitat.

Cell: J32

Comment: Gary Becker:
Aquatic plan in development

Cell: B33

Comment: Gary Becker:
Acquired by 2003-008-00

Cell: H33

Comment: Gary Becker:
A conservation lease allowing habitat enhancement on owner's property, which Columbia Land Trust has leveraged with funds from other entities.

Cell: B34

Comment: Gary Becker:
Acquired by 2003-008-00

Cell: H34

Comment: Gary Becker:

The USFWS now owns the property and it's part of the Julia Hansen Butler Columbian White-tailed Deer National Wildlife Refuge.
BPA holds CE prohibiting the usual: residential or commercial use, soil or trash deposition; excavation or dredging; topogirphical alterations; grazing, logging, or other uses that BPA determines has a material negative impact on fish or fish and wildlife habitat.

Cell: J34

Comment: Gary Becker:
USFWS published draft refuge management plan and EIS on 2/10/2010.

Cell: H35

Comment: Gary Becker:
BPA holds CE prohibiting the usual: residential or commercial use, soil or trash deposition; excavation or dredging; topogirphical alterations; grazing, logging, or other uses that BPA determines has a material negative impact on fish or fish and wildlife habitat.

Cell: H36

Comment: Gary Becker:
Columbia Land Trust owns in fee and adjacent to the Twilight Eagle Sanctuary and serveral other properties held for conservation.
BPA holds CE prohibiting the usual: residential or commercial use, soil or trash deposition; excavation or dredging; topogirphical alterations; grazing, logging, or other uses that BPA determines has a material negative impact on fish or fish and wildlife habitat.